

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION**

<b>IN THE MATTER OF THE</b>	)	
<b>CRIMINAL COMPLAINT FILED</b>	)	<b>Case No.</b>
<b>AGAINST UCHECHI OHANAKA</b>	)	
<b>AKA "MIKE"</b>	)	

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT**

I, Glen M. Kessler, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a law enforcement officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18 of the United States Code.

2. I am a Special Agent with the United States Secret Service ("USSS") assigned to the Savannah Resident Office. I have been employed by the USSS since September of 1995 and have been assigned to the Savannah Resident Office since March of 2015. As a Special Agent, I have been involved with numerous criminal investigations including credit card fraud, bank fraud, access device fraud, identity theft, wire fraud, money laundering, and various other crimes. I have executed many arrests and executed multiple search and seizure warrants in my more than 20 years as a Special Agent.

3. I am presently involved in an investigation of various subjects in connection with a Conspiracy to Commit Bank Fraud in violation of Title 18, United States Code, Section 1349; Bank Fraud in violation of Title 18, United States Code,

Section 1344; Wire Fraud in violation of Title 18, United States Code, Section 1343; Aggravated Identity Theft in violation of Title 18, United States Code, Section 1028A; and Money Laundering in violation of Title 18, United States Code, Sections 1956 and 1957.

4. Based upon my training and experience, and the facts and circumstances set forth below, I submit that there is probable cause to believe that at an unknown date 2017 and continuing to the present, **Uchechi Ohanaka, also known as “Mike”**, (referred to herein as “**Ohanaka**”), aided and abetted by others, knowingly conspired with others to defraud federally insured financial institutions. **Ohanaka** and others unlawfully acquired the personal identifying information and confidential bank account information of other individuals, without their consent, and used that information to steal and attempt to steal money. I therefore submit this affidavit in support of a criminal complaint charging **Ohanaka** with Conspiracy to Commit Bank Fraud in violation of Title 18, United States Code, Section 1349, and Aggravated Identity Theft in violation of Title 18, United States Code, Section 1028A.

5. The information provided in this affidavit is based upon my personal knowledge, observation, surveillance, analysis of bank and public source records, and information provided by other law enforcement officers and investigators involved with me in the investigation described below. This affidavit is being submitted for the limited purpose of establishing probable cause to issue a criminal complaint against **Ohanaka**. I have not included each and every fact known to me

concerning this investigation. I have set forth only the facts which I believe are essential to establish the necessary foundation for the arrest warrant.

### **The Defendant**

6. **Uchechi Ohanaka, also known as “Mike”,** is described as a black male, approximately 5 feet, 10 inches tall, 165 pounds, date of birth March 21, 1974, social security number ending in 0458, believed to be residing in Dallas, Texas. **Ohanaka’s** criminal history is extensive and includes multiple prior fraud convictions. On or about April 1, 2002, **Ohanaka** was convicted of Mail Fraud in the United States District Court for the Southern District of Texas for which he was sentenced to 84 months of imprisonment and three years of supervised release. While serving his supervised release sentence for this conviction, **Ohanaka** was convicted on August 5, 2011, in the United States District Court for the Southern District of Texas of Conspiracy to Commit Bank Fraud and Aggravated Identity Theft for which he was sentenced to 43 months imprisonment and 5 years of supervised release. **Ohanaka** is currently serving his term of supervised release for this conviction, and is being supervised by the United States Probation Office in Houston, Texas.

### **Probable Cause**

7. Between September and November 2017, a cooperating individual (“CS1”) was arrested and charged with various state offenses related to his possession of fake identifying documents and his attempt to conduct financial transactions at a financial institution. In or about November 2017, CS1 elected to

cooperate with law enforcement in connection with his arrest, and met with Secret Service Agents located in Savannah, Georgia, to describe the scheme to defraud.

8. CS1 is a multi-convicted felon who is currently on supervised release for a prior federal felony conviction.

9. During his interview with Secret Service, CS1 explained that he had been working with coconspirators in Florida, Texas, Canada and elsewhere in obtaining personal identifying information and confidential bank account information of real individuals. Armed with this information, CS1 and others created false identification documents for these individuals, and would use the false identification documents and confidential bank account information to steal money from federally insured financial institutions.

10. CS1 further stated in furtherance of the scheme to defraud, he would, at times, travel to Dallas, Texas, where he met with an individual he knew as "Mike" or "Rashi". CS1 explained that a coconspirator ("Coconspirator 1") located in Florida introduced CS1 to "Mike", and explained to CS1 that "Mike" worked with individuals located in Canada and elsewhere in connection with the scheme to defraud. CS1 stated that he traveled to Dallas at the direction of Coconspirator 1, where he met "Mike," who drove CS1 to various financial institutions in and around Dallas, Texas, to conduct financial transactions using identification documents and confidential bank account information. CS1 would be provided false identifying documents for real people, and would use these fake documents to impersonate the real people and attempt to wire transfer or otherwise withdraw money from the

individual's financial accounts. CS1 stated that when he traveled to Dallas, "Mike" would also transport CS1 to state and local offices to incorporate businesses, and open bank accounts into which CS1 would wire transfer money or other deposit money obtained from compromised bank accounts.

11. Based on information provided by CS1 about "Mike," including a description of his vehicle and license plate, and through other investigations, Secret Service agents were able to identify Mike as **Ohanaka**.

12. Based on information provided by CS1 about Coconspirator 1, and through other investigations, Secret Service agents were able to identify Coconspirator 1 as an individual with initial K.D. Like CS1 and **Ohanaka**, K.D. is a convicted felon, having been previously convicted in the United States District Court for the Southern District of Florida for Conspiracy to Commit Mail Fraud. Like CS1 and **Ohanaka**, K.D. is also currently on supervised release.

13. On or about November 27, 2017, while in Savannah, within the Southern District of Georgia, CS1 conducted a consensually monitored and recorded interstate telephone call with Coconspirator 1 located in Florida. During the course of this call, Coconspirator 1 discussed with CS1 conducting additional wire transfers and other financial transactions in accounts held at Wells Fargo Bank and BBVA Compass Bank. The deposits of Wells Fargo Bank and BBVA Compass Bank were insured by the Federal Deposit Insurance Corporation ("FDIC").

14. On or about November 29, 2017, CS1 conducted a consensually monitored and recorded interstate telephone call with a second coconspirator

("Coconspirator 2"), who CS1 understood was in Canada and who asked CS1 to return to Dallas, Texas for the purposes of conducting additional fraudulent transactions at financial institutions. The call with Coconspirator 2 was also recorded.

15. Between November 27, 2017 and December 3, 2017, CS1 conducted numerous recorded telephone calls between and among **Ohanaka**, Coconspirator 1, and Coconspirator 2. During those telephone calls, CS1, **Ohanaka**, Coconspirator 1, and Coconspirator 2 discussed CS1's expected travel to Dallas; the identity of an individual whose account information had been compromised; and various types of financial transactions that CS1 would conduct using the compromised individual's identity and confidential bank account information. The compromised individual was identified as a physician located in Jacksonville, Florida, and his initials are M.E. During the recorded calls, CS1 and his coconspirators, to include **Ohanaka**, revealed that M.E. had a financial account at BBVA Compass Bank, whose deposits were then insured by the FDIC.

16. On or about December 3, 2017, CS1 traveled to Dallas, Texas, to meet with **Ohanaka** and others in furtherance of the scheme to defraud. CS1 was equipped during his travel with a GPS tracking device and a recording device, so that his interactions with **Ohanaka** and others in Dallas could be recorded. Moreover, a Secret Service agent from Savannah also traveled to Dallas, and conducted physical surveillance of CS1, **Ohanaka** and others in Dallas as well.

17. On or about December 4, 2017, CS1 had numerous consensually monitored and recorded telephone calls with **Ohanaka** and others, during which they discussed CS1 entering a BBVA Compass Bank branch, using the identity of M.E., and withdrawing approximately \$216,000 from M.E.'s financial account through a cashier's check.

18. On or about December 4, 2017, CS1 had three meetings with **Ohanaka**, all of which were recorded and monitored by the Secret Service. During these meetings, CS1 and **Ohanaka** further discussed CS1 impersonating M.E., and withdrawing approximately \$216,000 from M.E.'s financial account. Additionally, **Ohanaka** provided CS1 with a printout listing various pieces of personal identifying information of M.E., and instructed CS1 to memorize the information.

19. On or about December 5, 2017, at the direction of **Ohanaka**, CS1 traveled to a BBVA Compass Bank branch located in Dallas, Texas, in furtherance of the scheme to defraud. CS1 was under surveillance by the Secret Service during this time, and entered the BBVA Compass Bank branch. CS1 impersonated M.E., withdrew the \$216,000 from M.E.'s financial account, and exited the branch. After exiting the branch, CS1 was to meet with **Ohanaka** and deposit the check in another bank account, but shortly after leaving the bank, **Ohanaka** arrived to meet with CS1 and was arrested by Secret Service.

20. After his arrest, **Ohanaka** was provided his Miranda warnings, which he voluntarily waived. **Ohanaka** confessed to his role in the scheme to defraud, but refused to implicate any other coconspirators.

**Conclusion**

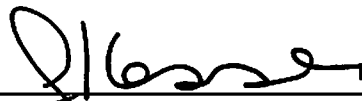
21. Based upon my training and experience, and the facts and circumstances set forth below, I submit that there is probable cause to believe that at an unknown date 2017 and continuing to the present, **Uchechi Ohanaka, also known as “Mike”**, aided and abetted by others, knowingly conspired with others to defraud federally insured financial institutions. **Ohanaka** and others unlawfully acquired the personal identifying information and confidential bank account information of other individuals, without their consent, and used that information to steal and attempt to steal money. I therefore submit this affidavit in support of a criminal complaint charging **Ohanaka** with Conspiracy to Commit Bank Fraud in violation of Title 18, United States Code, Section 1349, and Aggravated Identity Theft in violation of Title 18, United States Code, Section 1028A.

**Request for Sealing**

22. I further request that the Court order that all papers in support of this application, including this affidavit, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation.



Respectfully submitted,



Special Agent Glen M. Kessler  
United States Secret Service

Subscribed and sworn to before me on December 5, 2017.



HON. G.R. SMITH  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF GEORGIA